

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION

Case No.: 4:25-cv-03231

United States Courts  
Southern District of Texas  
**FILED**

NOV 13 2025

Brandon–Meion : Brown© (Pro Se),  
and Peter–Eugene : Alvarado©, a Disabled Minor,  
by Next Friend, Brandon–Meion : Brown©,  
Plaintiffs,

Nathan Ochsner, Clerk of Court

v.

Brazoria County Sheriff's Office / Jail;  
Brazoria Independent School District Police Department;  
Lighthouse Learning Center;  
Captain M. Crittenden,  
Defendants.

JOINT DISCOVERY / CASE MANAGEMENT PLAN  
(Submitted by Plaintiff Alone)

1. Appearances of Counsel

Plaintiffs:

Brandon–Meion : Brown©, Pro Se  
P.O. Box 84, Clute, Texas 77531  
Next Friend for Peter–Eugene : Alvarado©.

2. Nature of the Case

Plaintiffs allege violations under ADA, IDEA, Section 504, §1983, and maritime law. Claims include wrongful arrest post-heart surgery, excessive force, ADA failure-to-accommodate, jail medical neglect, and school negligence.

3. Jurisdiction

Jurisdiction under 28 U.S.C. §§1331, 1343, 1333 and 42 U.S.C. §§12132, 1983. Venue proper in SDTX.

4. Rule 26(f) Conference

Defendants have not appeared. Plaintiff submits this plan alone.

5. Initial Disclosures

Plaintiff will serve disclosures within 14 days.

6. Discovery Plan

Subjects: medical records, school discipline files, BISD police records, jail logs, ADA accommodations, use of force, IEP/IDEA failures.

Discovery cutoff: 120 days.

Experts: Plaintiff (90 days), Defendants (110 days).

7. Settlement

Plaintiff is open to mediation after disclosures.

8. Trial

Jury requested. Estimated 3–5 days.

9. Additional Orders Requested

Compel defendant participation; ADA accommodations; expedited production.

10. Signature

Brandon-Meion : Brown Pro Se Plaintiff Next Friend

Brandon-Meion : Brown©

Pro Se & Next Friend

Date: 11/13/2025